



Southern Region

Alert

OPPORTUNITY TO REDUCE THE REQUIREMENTS THAT THE AEROSPACE NESHAP MAKES ON YOUR INSTALLATION

SPECIAL EDITION OF AIRSTUFF July 13, 2000

Lawrence.Webber@aec.apgea.army.mil

US Army Environmental Center

If the Aerospace Surface Coating NESHAP affects your installation, you now have the opportunity to be part of a Military Services effort to exempt completely low volume users of non-exempt aerospace products (e.g. cleaning solvents) from the Aerospace NESHAP. This will help reduce both the amount of time this NESHAP requires of your installation's personnel and potential NOVs. The Services Steering Committee (SSC), comprised of the Army, Navy, Air Force, and Marine Corps; intends to petition a rule change requesting that EPA establish a low volume usage exemption for cleaning solvents under the Aerospace Surface Coating NESHAP in addition to the existing exemptions the NESHAP already has in place. The idea is that by adding a low volume usage exemption for cleaning solvents, a facility could then be exempt from the NESHAP in its entirety as long as the facility met all of the other exemptions required by the NESHAP. The facility would also need to not be subject to the Method 319 blast/coating booth filter requirements.

To support this petition's argument, we intend to provide EPA data showing that many Military installations spend hundreds to thousands of hours collecting data on the few gallons of aircraft cleaning solvents that they use each year. A low volume usage exemption would save affected installations thousands of dollars with negligible environmental impact. In order to have data to present to EPA, we need you to provide us this data within the next month. We describe the data that we need at the end of this memo.

A Navy facility spearheaded this effort and contracted for a cost benefit analysis. Data from this Navy installation indicates that military installations may spend a man-year of labor or more on data collection efforts with little or no environmental benefit. In the Aerospace Surface Coating NESHAP, EPA has already established low volume usage exemptions for topcoats and repainting solvents. The NESHAP exempts operations applying less than 200 gallons/year of topcoat from keeping records on their topcoating operations, and facilities applying less than 50 gallons/year/military aircraft of repainting solvent from keeping records on this solvent.

The SSC intends to recommend that EPA extend this logic and add a "small" or "low usage exemption" for cleaning solvents. The SSC is trying to determine a low usage cut off point for cleaning solvents. We appreciate your feedback suggesting a good number.

To convince EPA of the need to exempt facilities using less than (a number of gallons/year that will be determined based on military installation annual usage volumes) of cleaning solvents from the Aerospace NESHAP, the SSC needs data to demonstrate that the manpower burden of collecting this data far outweighs any environmental benefit. The SSC needs your data. If you would like to assist the SSC effort to convince EPA to establish a low usage exemption for cleaning solvents, please provide AEC the following data. The more data the SSC has, the easier it will be for them to convince EPA to create a small usage exemption for cleaning solvents in the Aerospace Surface Coating NESHAP.

- 1) Amount of time spent by all installation personnel recording volumes of cleaning solvents consumed.
- 2) Amount of time spent by all installation personnel determining vapor pressures of various cleaning solvents.

If you would like to support this effort by providing us this data, please call either myself (Paul Josephson DSN 584-1205, com (410) 436-1205) or Ms. Lisa Trembly of the Naval Facilities Engineering Service Center DSN 551-3567 to discuss the best methods for collecting this data. Any data that will be forwarded to EPA must be collected by 15 August 2000.

Paul Josephson
Army Environmental Center
DSN 584-1205, com (410) 436-1205
paul.josephson@aec.apgea.army.mil

AIRSTUFF is an INFORMAL communication of the USAEC Air Compliance Media Manager who is solely responsible for its content. Official policy/guidance/alerts will continue through established channels. Please send any comments, questions or topics via one of the listed means.

REGION 4 EDITION

CONTENTS

This publication provides current information on environmental actions and events in the Federal Region 4 area (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee) that affect U.S. Army activities and operations. Its purpose is to keep Army environmental decision-makers, planners and program managers abreast of developments important to their responsibilities. We encourage feedback and welcome suggestions for expanded or improved coverage. Please contact us at: U.S. Army Environmental Center, Southern Regional Environmental Office, Attn: SFIM-AEC-SR, 101 Marietta Street, NW, Suite 3120 Atlanta, GA 30303-2720 Phone 404-524-5061 x275 Fax 404-524-5162 or at sreo@sreo.army.mil. For additional sources of information regarding environmental regulations, please contact the Army Environmental Information System Hotline at 1-800-USA-EVHL or <http://aec.army.mil/>

SOUTHERN REGIONAL ENVIRONMENTAL OFFICE PERSONNEL DIRECTORY

George Carellas carellas@sreo.army.mil	404-524-5061 ext. 277
Ed Engbert eenqbert@sreo.army.mil	404-524-5061 ext. 228
Jamie Higgins jhiggins@sreo.army.mil	404-524-5061 ext. 274
Bob Mashburn mashburn@sreo.army.mil	404-524-5061 ext. 284
Linda Sohns lsohns@sreo.army.mil	404-524-5061 ext. 297
Adrienne Willis awillis@sreo.army.mil	404-524-5061 ext. 275
Gary Zolyak gary.zolyak@aec.apgea.army.mil	410-436-1275

SOUTHERN REGION ALERT - SPECIAL EDITION

Department of the Army
Army Environmental Center
Southern Regional Environmental Office
Attn: SFIM-AEC-SR
101 Marietta Street, NW, Suite 3120
Atlanta, GA 30303-2720